

REMARKS/ARGUMENTS

Claims 15 and 16 have been added. Upon entry of this amendment claims 1-16 will be pending. After the amendments made herein are entered, claims 1-16 will be pending in the application.

CLAIM REJECTIONS UNDER 35 U.S.C. § 112

Claims 1-14 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

Applicants thank the examiner for pointing out these minor informalities and assert that the amendments made herein obviate the examiners rejections.

CLAIM REJECTIONS UNDER 35 U.S.C. § 103

Claims 1, 2 and 9 are rejected under 35 U.S.C. § 103(a) as obvious under *Muller* in view of *Angell*. Applicant respectfully traverses these rejections.

To establish a *prima facie* case of obviousness, three criteria must be met. Firstly, there must be some suggestion or motivation, to modify the references or to combine reference teachings. Secondly, there must be a reasonable expectation of success. Finally, the prior art must teach all of the claimed limitations, M.P.E.P. § 2142.

The cited prior art *Muller* and *Angell*, either separately or in combination with each other, do not teach or suggest all the claim limitations. For example, claim 1, upon which all the claims in the current application depend, recites a combination including, in part, a grinding belt having “the counterpiece is at least as wide as the width of the grinding belt containing the recess, and the recess is symmetrical about a centerline access running parallel to the grinding belt.” As the Examiner pointed out on page 3 of the Office Action, *Muller* does not disclose a hole where roughly the length of the hole corresponds to the width of the belt. At the same time, it also does

not disclose the counterpiece that is at least as wide as the width of the grinding belt containing the recess, and a recess that is symmetrical about a centerline access running parallel to the grinding belt. *Angell* does not cure the insufficiencies of *Muller*. If as the Examiner suggests, the hole of *Muller* was reconfigured to have a length nearly the equal to the width of the head as taught by *Angell* resulting combination would not result in a combination satisfying all of the claim limitations of independent claim 1. As illustrated in FIGS. 1 and 2 of *Angell*, *Angell* does not teach or describe the combination where the counterpiece is at least as wide as the width of the grinding belt containing the recess, and the recess is symmetrical about a counterpiece axis running parallel to the grinding belt.” The counterpiece of *Angell* is much more narrow than the grinding belt containing the recess. Further, the hole, as described in *Angell*, is not symmetrical about a centerline access running parallel to the grinding belt, but rather is asymmetrical hole as illustrated in FIGS. 1 and 2. Thus, neither *Muller* nor *Angell*, separately or in combination, teach or suggest a combination as recited by claim 1 and the dependent claims. For at least these reasons, Applicant respectfully suggests that the rejection of claims 1, 2 and 9, under 35 U.S.C. § 103(a), as being obvious over *Muller* in view of *Angell* be removed.

Claims 1 and 2 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Takagi* in view of either *Ashworth* or *Volz*. Applicant respectfully traverses these rejections. In other references, either separately or in combination of *Takagi*, *Ashworth* or *Volz*, teach or suggest a combination as recited by independent claim 1 and its dependent claims 2-16. For example, claim 1 recites a grinding belt having “the counterpiece is at least as wide as the length of the grinding belt containing a recess.” As illustrated in the figures of *Takagi*, the counterpiece is significantly more narrow than the lapping tape containing the hole. Similarly, in *Volz*, the counterpiece is significantly more narrow than the extension containing the hole. See FIGS. 1 and 5. And in *Ashworth*, the counterpiece is significantly less wide as the belt containing the hole. See FIGS. 1, for example. Thus, none of the references, either separately or in combination with each other, teach or suggest a combination recited by claim 1 and its dependent

claims. Therefore, the Applicant respectfully requests that the rejections under 35 U.S.C. § 103(a) of claims 1 and 2 as being unpatentable over *Takagi* in view of *Ashworth* or *Volz* be removed.

Claims 3-14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Takagi* in view of either *Ashworth* or *Volz* and/or *Muller* in view of *Angell*, as applied to claims 1 and 2 above and further in view of *Smith*. Claims 3-14 are dependent from claim 1, and claim 1 has been shown above to be patentable over *Takagi* in view of *Ashworth* or *Volz* and/or *Muller* in view of *Angell* at least for the reasons recited above. Therefore, claims 3-14 are patentable at least by reason of their dependency from claim 1. Therefore, Applicant respectfully requests that the rejections of claims 3-14 under 35 U.S.C. § 103(a) as being unpatentable over *Takagi* in view of *Ashworth* or *Volz* and/or in view of *Muller* in view of *Angell* be removed.

CONCLUSION

In view of the foregoing, reconsideration and allowance of the application are believed in order, and such action is earnestly solicited. Should the Examiner believe that a telephone conference would expedite issuance of the application, the Examiner is respectfully invited to telephone the undersigned attorney at (202) 861-1792. Please charge any fee deficiencies or credit any overpayments to Deposit Account No. 50-2036.

Respectfully submitted,

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